IN THE UNITED STATES DISTRICT COURT FOR THE EASTERN DISTRICT OF VIRGINIA Richmond Division

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| Case 3:17-cv-601-MHL |
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CONSENT MOTION TO RESET PRETRIAL CONFERENCE

Plaintiffs, Robert David Steele and Earth Intelligence Network ("Plaintiffs"), by counsel, respectfully request the Court to reset the Pretrial Conference in this matter.

- 1. On June 27, 2019, the Court entered its Order Setting Pretrial Conference. [*ECF No. 130*]. The Pretrial Conference is set for July 30, 2019 at 12:15 P.M.
- 2. Plaintiff's counsel starts a two-day jury trial in the Virginia Beach Circuit Court on July 29, 2019, and will be in trial on July 30.
- 3. Upon entry of the Court's Order, Plaintiff's counsel immediately notified all parties of the scheduling conflict, and conferred by email.
- 4. Counsel for Plaintiffs is available on July 31, 2019, as is Defendant Goodman and Counsel for Defendant Negron.
- 5. Defendant Goodman and Defendant Negron, by counsel, consent to Plaintiff's request to reset the Pretrial Conference to July 31, 2019.

Because of the unavoidable scheduling conflict, Plaintiffs respectfully move the Court to reset the date and time of the Pretrial Conference.

A proposed Order is attached hereto as *Exhibit "A"*.

DATED: June 28, 2019

ROBERT DAVID STEELE EARTH INTELLIGENCE NETWORK

By: /s/Steven S. Biss

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Counsel for the Plaintiffs

CERTIFICATE OF SERVICE

I hereby certify that on June 28, 2019 a copy of the foregoing was filed electronically using the Court's CM/ECF system, which will send notice of electronic filing to counsel for Defendant, Patricia A. Negron, and all interested parties receiving notices via CM/ECF. I also certify that a copy of this pleading was emailed in PDF to Defendants, Goodman and Lutzke.

By: /s/Steven S. Biss

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